

To: Jones, Joel E.[Jones.Joel@epa.gov]
From: Don't Waste Arizona
Sent: Mon 10/31/2016 9:48:02 PM
Subject: Fw: Arlington Pictures of smoke etc
[Arlington Egg Ranch Air Permit 040136.pdf](#)
[Rule 200-Permit Requirements.pdf](#)
[Rule 230-General Permits.pdf](#)
[Rule 300-Visible Emissions.pdf](#)
[Rule 310-Fugitive Dust from Dust-Generating Operations.pdf](#)
[Rule 310.01-Fugitive Dust from Non-Traditional Sources.pdf](#)
[Rule 311-Particulate Matter from Process Industries.pdf](#)
[Rule 313-Incinerators . . . pdf](#)
[Rule 314-Open Outdoor Fires . . . pdf](#)
[Rule 320-Odors and Gaseous Air Contaminants.pdf](#)
[Rule 324-Stationary Internal Combustion Engines.pdf](#)
[Rule 350 Storage of Organic Liquids.pdf](#)

From: [Daniel Blackson](#)
Sent: Wednesday, May 20, 2015 11:53 AM
To: [Genell Pridgen](#)
Cc: [Denise Luk](#) ; [Linda Butler](#) ; [MIWirth@atiaz.com](#) ; [Steve Love](#) ; [Howard Shanker](#) ; [tjerina372@gmail.com](#) ; [Danielle SRAP Diamond](#) ; [Linda Davis](#) ; [Steve Brittle](#) ; [Connie Blayney](#)
Subject: Re: Arlington Pictures of smoke etc

Genell,

This is my response to the Maricopa County Air Quality Department Ombudsman, Hether Krause, regarding the rotary dryer at the Arlington Egg Factory:

"Ms. Krause,

With due respect, because you say it is "agriculture" does not make it so. For example, the emergency diesel generators (Rule 324) are regulated through the County's Non-Title V Air Quality Permit #040136, as well as opacity (Rule 300), and gasoline storage & dispensing (Rule 350). The County has issued violation of open outdoor fires (Rule 314) when the rows of manure were smoldering. The County also included the onsite incinerator (Rule 313) in Non-Title V Air Quality Permit as part of the initial permit and after it was disconnected includes it on the permit as De Minimis Equipment. The permit also regulates agriculture related equipment for feed mills and grain receiving & storage. There is no rationale to now say that this pollution generating, black smoke belching, fuel burning equipment is not regulated by Maricopa County Air Quality Department.

Please provide some rigor and regulatory analysis for your determination "that the rotary dryer is a component of the agricultural process of fertilizer production and the associated release contains particulates. ADEQ is responding to the

concerns related to all particulate complaints regarding this process due to the agricultural aspects.” As part of your research, I would suggest that you read ARS 49-457.”

I have attached all of the Maricopa County Air Quality Department rules that I referenced, rules for permitting, and the facility's Non-Title V Air Quality Permit.

Dan

On May 18, 2015, at 8:17 AM, Genell Pridgen <genellp@sraproject.org> wrote:

Dan

Please send me the regulatory citations you are referring to. I am not at my office now and don't have the regs in front of me but I will tonight. I think it's great you are in the group and we can bounce some ideas off of each other. I know there is a rule on dust (20 percent opacity for no more than 3 minutes per hour?) Or something to that effect. I need to have the regular in front of me and we can go over it together and discuss it.

On May 18, 2015 10:48 AM, "Daniel Blackson" <blackson.daniel@yahoo.com> wrote:

Genell,

How can I help? I have an ongoing dialogue with Maricopa County Air Quality Department about this issue and provided them regulatory citations where they are obligated to permit the rotary drier. I have been an Environmental Manager where I negotiated and acquired air quality

permits and an Operations Manager where I implemented them in Maricopa County as well as other permits, regulations, and statutes.

Dan

On May 17, 2015, at 7:23 PM, Genell Pridgen
<genellp@sraproject.org> wrote:

Great. Keep that documentation. We will keep working on this. I am looking at some regulations now, but the document is over 900 pages and not an easy read. Will keep you updated.

Genell

On Sun, May 17, 2015 at 9:32 PM, Linda Butler
<linda.butler2014@gmail.com> wrote:

I took these pictures on 5/14/15 around 2pm... I will call in a complaint, and also wanted to pass along these pix for your use/info . If you need them in .jpg format, instead of Word doc, just let me know.

Linda Butler
[805-452-5450](tel:805-452-5450)

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>

No virus found in this message.
Checked by AVG - www.avg.com
Version: 2015.0.5941 / Virus Database: 4347/9833 - Release Date: 05/21/15